

THE HONORABLE ROBERT S. LASNIK

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

TOMMY BROWN, on his own behalf and
on behalf of other similarly situated
persons,

Plaintiff,

v.

TRANSWORLD SYSTEMS, INC., *et al.*,

Defendants.

No. 2:20-cv-00680-RSL

DECLARATION OF ALBERTO N. MORIS,
AS MANAGING AGENT OF PATHMARK
ASSOCIATES, LLC AND CECE & CO.
LTD., LLC

1 ALBERTO N. MORIS, pursuant to 28 U.S.C. § 1746, declares as follows:

2 1. I am the managing agent of Pathmark Associates, LLC ("Pathmark") and CECE &
3 Co. Ltd., LLC ("CECE"). In my role, I have access to the records of Pathmark and CECE. I make
4 this declaration with the required authority of both Pathmark and CECE and based on my personal
5 knowledge and review of Pathmark's and CECE's business records kept in the normal course of
6 their business operations.

7 2. This declaration is being given as written testimony in lieu of either Pathmark or
8 CECE appearing for remote, video and oral depositions by their authorized representative(s) on
9 the jurisdictional questions pending before the Court.

10 3. Pathmark is a Delaware Limited Liability Company whose sole member is CECE.

11 4. CECE is a Delaware Limited Liability Company whose sole member is Highland
12 Undertakings, LLC, a Nevis Limited Liability Company ("Highland").

13 5. Highland has two members who are individuals. Both individuals are citizens of
14 foreign countries. Neither individual is a citizen of the United States or the State of Washington.

15 6. I am contractually prohibited from identifying the identities of Highland's two
16 members. If either Pathmark or CECE appears for a deposition, their designee witness(es) would
17 also be contractually prohibited from identifying the identities of Highland's two members.

18 7. Because of the contractual obligations identified above, neither Pathmark nor
19 CECE have disclosed to Plaintiff, Defendants, or their counsel the identities of Highland's two
20 members.

21 I declare under penalty of perjury under the laws of the United States that the foregoing is
22 true and correct.

23 **EXECUTED** on this 18th day of September 2020 at Doral, Florida.

24
25 
26 Alberto N. Moris